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September 3, 2021

**VIA ELECTRONIC FILING**

Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *US v. Mosha*, et al. 21 Cr. 92 (AJN)

Dear Judge Nathan:

I respectfully submit this letter to request an extension of time to file pretrial motions for all parties until October 15, 2021.

The discovery in this case is voluminous. In addition, I am preparing for two trials: assisting with a trial commencing on September 8, 2021: *State of New Jersey v. Ted Connors*, in New Jersey Superior Court, Monmouth County Vicinage, Indictment 20-02-0273 and will be lead counsel in a month-long trial on September 28, 2021, in *United States v. Elmer Cruz-Diaz*, Crim. No: 16-453 (CCC), before the Honorable Claire C. Cecchi, U.S.D.J., in the United States District Court, District of New Jersey.

The Government, through Assistant US Attorney Jonathan Rebold, consents to this request and the attorneys for all other co-defendants have no objection to this request. Additionally, we request that all dates in relation to motions be extended, including all response and reply papers.

Respectfully submitted,

/s/ Stephen Turano  
STEPHEN TURANO

cc: All Parties (via ECF)